



The Chemours Company
Fluoroproducts
22828 NC Highway 87 W
Fayetteville, NC 28306-7332

910-483-4681 ext.
chemours.com

CERTIFIED MAIL ARTICLE NUMBER 7016 1370 0001 3345 8313
RETURN RECEIPT REQUESTED

February 26, 2018

Mr. Gregory W. Reeves
NCDEQ – Division of Air Quality
225 Green Street
Suite 714
Fayetteville, NC 28301-5043

SUBJECT: Miscellaneous Organic Chemical Manufacturing NESHAP (MON)
Compliance Report – July 1, 2017 through December 31, 2017
Title V Permit Number 03735T43
Facility ID: 0900009

Dear Mr. Reeves:

Attached is the Chemours Company – Fayetteville Works' Compliance Report for the Miscellaneous Organic Chemical Manufacturing NESHAP (40 CFR Part 63 Subpart FFFF) for the reporting period from July 1, 2017 through December 31, 2017. Enclosed is the required photocopy of this report.

If you should have any questions, please call me at 910-678-1155.

Sincerely,

Michael E. Johnson, PE
SHE Senior Consultant

Attachment / Enclosure

cc: U.S. EPA Region 4, Air and EPCRA Enforcement Section, Atlanta, GA
[Certified Mail Article Number 7016 1370 0001 3345 8450]

Miscellaneous Organic Chemical Manufacturing NESHAP (MON)
Part 63 Subpart FFFF
Compliance Report
40 CFR 63.2520(e)
Chemours Company – Fayetteville Works
North Carolina Title V Air Permit No. 03735T43
Reporting Period from July 1, 2017 through December 31, 2017

40 CFR 63.2520(e)(1) *Company name and address:*

Chemours Company – Fayetteville Works
22828 NC Highway 87 W
Fayetteville, NC 28306-7332

40 CFR 63.2520(e)(2) *Statement by a responsible official with that official's name, title, and signature, certifying the accuracy of the content of the report.*

See Attachment 1 for this certification statement.

40 CFR 63.2520(e)(3) *Date of report and beginning and ending dates of the reporting period.*

The date of this report is February 26, 2018. The reporting period of this report is from July 1, 2017 through December 31, 2017.

40 CFR 63.2520(e)(4) *For each SSM during which excess emissions occur, the compliance report must include records that the procedures specified in your startup, shutdown, and malfunction plan (SSMP) were followed or documentation of actions taken that are not consistent with the SSMP, and include a brief description of each malfunction.*

There are no sources subject to the Subpart FFFF NESHAP for which a startup, shutdown, and malfunction plan (SSMP) is required.

40 CFR 63.2520(e)(5) *The compliance report must contain the information on deviations, as defined in §63.2550, according to paragraphs (e)(5)(i), (ii), (iii), and (iv) of this section.*

There were no deviations from the emission limits, operating limits, or work practice standards during the reporting period.

40 CFR 63.2520(e)(5)(i) *If there are no deviations from any emission limit, operating limit or work practice standard specified in this subpart, include a statement that there were no deviations from the emission limits, operating limits, or work practice standards during the reporting period.*

There were no deviations from the emission limits, operating limits, or work practice standards during the reporting period.

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40 CFR 63.2520(e)(5)(ii) *For each deviation from an emission limit, operating limit, and work practice standard that occurs at an affected source where you are not using a continuous monitoring system (CMS) to comply with the emission limit or work practice standard in this subpart, you must include the information in paragraphs (e)(5)(ii)(A) through (C) of this section. This includes periods of SSM.*

There were no deviations from the emission limits, operating limits, or work practice standards during the reporting period.

40 CFR 63.2520(e)(5)(iii) *For each deviation from an emission limit or operating limit occurring at an affected source where you are using a CMS to comply with an emission limit in this subpart, you must include the information in paragraphs (e)(5)(iii)(A) through (L) of this section. This includes periods of SSM.*

There were no deviations during the reporting period. In addition, no affected sources at this facility use a continuous monitoring system to comply with an emission limit in this subpart.

40 CFR 63.2520(e)(5)(iv) *If you documented in your notification of compliance status report that an MCPU has Group 2 batch process vents because the non-reactive HAP is the only HAP and usage is less than 10,000 lb/yr, the total uncontrolled organic HAP emissions from the batch process vents in an MCPU will be less than 1,000 lb/yr for the anticipated number of standard batches, or total uncontrolled hydrogen halide and halogen HAP emissions from all batch process vents and continuous process vents in a process are less than 1,000 lb/yr, include the records associated with each calculation required by §63.2525(e) that exceeds an applicable HAP usage or emissions threshold.*

This section is not applicable. Neither HAP usage nor an emissions threshold was exceeded during the reporting period.

40 CFR 63.2520(e)(6) *If you use a CEMS, and there were no periods during which it was out-of-control as specified in §63.8(c)(7), include a statement that there were no periods during which the CEMS was out-of-control during the reporting period.*

This section is not applicable. No affected sources at this facility use a continuous emission monitoring system.

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40 CFR 63.2520(e)(7) *Include each new operating scenario which has been operated since the time period covered by the last compliance report and has not been submitted in the notification of compliance status report or a previous compliance report. For each new operating scenario, you must provide verification that the operating conditions for any associated control or treatment device have not been exceeded and that any required calculations and engineering analyses have been performed. For the purposes of this paragraph, a revised operating scenario for an existing process is considered to be a new operating scenario.*

This section is not applicable. This site does not have any new operating scenarios that have been operating since the submittal of the notification of compliance status report.

40 CFR 63.2520(e)(8) *Records of process units added to a PUG as specified in §63.2525(i)(4) and records of primary product redeterminations as specified in §63.2525(i)(5).*

This section is not applicable. This site does not have any process unit groups.

40 CFR 63.2520(e)(9) *Applicable records and information for periodic reports as specified in referenced subparts F, G, H, SS, UU, WW, and GGG of this part and subpart F of 40 CFR part 65.*

The periodic report for Subpart UU as specified in 40 CFR 63.1039(b) is provided as Attachment 2.

Monitoring was not performed during the month of October 2017 because the facility ceased all operations by October 7, 2017, to begin the annual maintenance turnaround. All operations remained shut down until the conclusion of the maintenance turnaround on November 10, 2017. The general LDAR requirements of the Hazardous Organic NESHAP (“HON”) in Part 63.162(g)(3)(i) defines the period of time for completion of required tasks and stipulates that compliance is required if there remain at least 2 weeks for tasks that must be performed monthly. Since the available days for monitoring in October 2017 was 7 days or less for the processes subject to the Subpart UU, then monitoring was not required.

The report for the HFPO Compliance Group indicates a Late Repair of a leaking pump in December 2017. This was an allowable delay of repair per 40 CFR 63.1024(d)(1), which states:

“Delay of repair of equipment for which leaks have been detected is allowed if repair within 15 days after a leak is detected is technically infeasible without a process unit or

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affected facility shutdown. Repair of this equipment shall occur as soon as practical, but no later than the end of the next process unit or affected facility shutdown, except as provided in paragraph (d)(5) of this section.”

An HFPO Process pump was monitored and found to be leaking on 12-12-2017. The first attempt to repair the leak and the post-repair monitoring were completed on 12-12-2017, but the pump was found to be still leaking. The repair of this pump required the shutdown of both the HFPO Process and the Vinyl Ethers South Process. These processes continued to operate until 12-27-2017, when the Vinyl Ethers South Process’ completed its scheduled production and could be shut down normally.

The HFPO process pump was rebuilt and placed back into service on 12-27-2017. The LDAR contractor was contacted and scheduled to perform the required monitoring of the rebuilt pump. On 12-29-2017, the pump was monitored via Method 21 by the LDAR contractor and found to be not leaking.

Since the repair of the leaking pump required a process unit shutdown, and since the actual repair of the pump occurred as soon as practical, the delay of repair of the pump complied with the requirements of 40 CFR 63.1024(d)(1).

Pursuant to Section 2.1(C)(8)(q) of this facility’s Title V Permit and 40 CFR 63.2480(b)(4), connectors in gas and vapor and light liquid service are monitored for leaks using the instrument monitoring methods described in 40 CFR 63.1023(b) if evidence of a potential leak to the atmosphere is found by visual, audible, olfactory, or any other detection method. During the reporting period, no leaking connectors were found by visual, audible, olfactory, or any other detection method.

The facility has pressure relief valves that are in HAP service and are subject to the requirements of 40 CFR §63.2480, which specifies the compliance requirements of 40 CFR §63.1030. Those pressure relief valves are exempt from the requirements of paragraphs (b) and (c) of §63.1030 for being either unsafe-to-monitor per §63.1025(e)(1), a pressure relief device that is routed to a process system per §63.1030(d), or a pressure relief device that is equipped with a rupture disk upstream of the pressure relief device per §63.1030(e). During the reporting period, none of the pressure relief valves experienced a pressure release.

The facility has two (2) heat exchangers that are subject to the requirements of 40 CFR §63.2490, which specifies the compliance requirements of 40 CFR §63.104. During the

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reporting period, the required quarterly monitoring of the entrance and exit of once-through cooling water was performed on both heat exchangers and no leaks were detected.

40 CFR 63.2520(e)(10) *Notification of process change.*

This section is not applicable. Since the submittal of the notification of compliance status report, this site has not made any process changes that are not within the scope of an existing operating scenario.

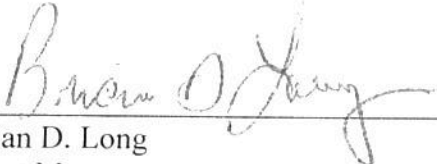
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ATTACHMENT 1

Certification of Report Accuracy

As required by 40 CFR 63.2520(e)(2), this document is the statement by a responsible official certifying the accuracy of the content of the subject Miscellaneous Organic Chemical Manufacturing NESHAP ("MON") compliance report.

By my signature below, I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is accurate. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.



Brian D. Long
Plant Manager

February 26, 2018

Date

Miscellaneous Organic Chemical Manufacturing NESHA (MON)

Part 63 Subpart FFFF

Compliance Report

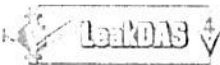
40 CFR 63.2520(e)

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ATTACHMENT 2

Periodic Monitoring Summary		Report Parameters	
Report: R807		MON-UU	
Report Date: 1/2/2018 12:22:57PM		Report from: 2017-7-1 00 To 2017-12-31	

Compliance Group:

HFPO

		<u>Leaking</u>	<u>Inspected</u>	<u>Percent</u> <u>Leaking</u>	<u>Late</u> <u>Repairs</u>	<u>Non</u> <u>Repairable</u>
VALVES	AUGUST	2	177	1.13	0	0
	NOVEMBER	0	177	0.00	0	0
PUMPS	JULY	0	3	0.00	0	0
	AUGUST	0	3	0.00	0	0
	SEPTEMBER	0	3	0.00	0	0
	NOVEMBER	0	3	0.00	0	0
	DECEMBER	1	3	33.33	1	0

Miscellaneous Organic Chemical Manufacturing NESHA (MON)

Part 63 Subpart FFFF

Compliance Report

40 CFR 63.2520(e)

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ATTACHMENT 2

Periodic Monitoring Summary

Report: RS07

Report Date: 1/2/2018

12:22:59PM

Report Parameters

MON-UU

Report from: 2017-7-1 00 To: 2017-12-31

Compliance Group:

POLYMERS

		<u>Leaking</u>	<u>Inspected</u>	<u>Percent</u> <u>Leaking</u>	<u>Late</u> <u>Repairs</u>	<u>Non</u> <u>Repairable</u>
VALVES	AUGUST	0	64	0.00	0	0
	NOVEMBER	0	64	0.00	0	0
PUMPS	JULY	0	2	0.00	0	0
	AUGUST	0	2	0.00	0	0
	SEPTEMBER	0	2	0.00	0	0
	NOVEMBER	0	2	0.00	0	0
	DECEMBER	0	2	0.00	0	0

Miscellaneous Organic Chemical Manufacturing NESHAP (MON)

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ATTACHMENT 2

Periodic Monitoring Summary			Report Parameters		
Report: RS07			MON-UU		
Report Date:	1/2/2018	12:22:59PM	Report from:	2017-7-1/00	To 2017-12-31

Compliance Group:

VE NORTH

		<u>Leaking</u>	<u>Inspected</u>	<u>Percent Leaking</u>	<u>Late Repairs</u>	<u>Non Repairable</u>
VALVES	AUGUST	0	212	0.00	0	0
	NOVEMBER	0	212	0.00	0	0
PUMPS	JULY	0	3	0.00	0	0
	AUGUST	0	3	0.00	0	0
	SEPTEMBER	0	3	0.00	0	0
	NOVEMBER	0	3	0.00	0	0
	DECEMBER	0	3	0.00	0	0
AGITATORS	JULY	0	1	0.00	0	0
	AUGUST	0	1	0.00	0	0
	SEPTEMBER	0	1	0.00	0	0
	NOVEMBER	0	1	0.00	0	0
	DECEMBER	0	1	0.00	0	0

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Periodic Monitoring Summary		Report Parameters	
Report: RS07		MON-UU	
Report Date: 1/2/2018	12:22:59PM	Report from: 2017-7-1 00 To: 2017-12-31	

Compliance Group:

VE SOUTH

		<u>Leaking</u>	<u>Inspected</u>	<u>Percent Leaking</u>	<u>Late Repairs</u>	<u>Non Repairable</u>
VALVES	AUGUST	0	207	0.00	0	0
	NOVEMBER	0	207	0.00	0	0
PUMPS	JULY	0	6	0.00	0	0
	AUGUST	0	6	0.00	0	0
	SEPTEMBER	0	6	0.00	0	0
	NOVEMBER	0	6	0.00	0	0
	DECEMBER	0	6	0.00	0	0

